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VIA ECF

The Honorable Magistrate Judge Sanket J. Bulsara
United States Magistrate Judge
Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Daniel Presti and Louis Gelormino v. City of New York, et al., 1:21-cv-03811 (PKC)(SJB)

Dear Magistrate Judge Bulsara:

I am the Assistant Corporation Counsel in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, representing Defendants in the above-referenced matter. After conferring with Matthew Schmidt, Esq., counsel for Plaintiffs, both Plaintiffs and Defendants jointly request that the initial conference scheduled for October 8, 2021 be adjourned. The reason for this request is that Defendants have not yet filed an answer to the Complaint, but will instead file a motion to dismiss under F.R.C.P. 12(b)(6). Pursuant to this Court's order, Defendants have until October 12, 2021 to answer the complaint or otherwise move. The Parties respectfully ask that the Initial Conference be adjourned pending the resolution of Defendant's forthcoming motion to dismiss.

To my knowledge, no previous request for an adjournment of the initial conference has been made in this case. Accordingly, I respectfully request, with the consent of Plaintiffs' counsel, that Your Honor grant the relief sought herein. I thank the Court for its consideration

Sincerely,

Joseph Pepe, Esq.
Assistant Corporation Counsel